

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SYNIDA LEANN LOPEZ DE PAZ,

Plaintiff,

v.

EXPERIAN INFORMATION
SOLUTIONS, INC. d/b/a EXPERIAN,

Defendant.

No. 1:25-cv-2180

NOTICE OF REMOVAL

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*Attorney for Defendant
Experian Information Solutions, Inc.*

Pursuant to 28 U.S.C. § 1441 *et seq.*, Defendant Experian Information Solutions, Inc. hereby files this Notice of Removal of the above-captioned action to this Court and state as follows:

1. On February 13, 2025, an action was filed by Plaintiff Synida Leann Lopez de Paz in the Supreme Court of the State of New York, County of New York, titled *Synida Leann Lopez de Paz v. Experian Information Solutions, Inc. dba Experian*, Index No. 151968/2025.

2. Experian was served with the Summons and Complaint on or about February 24, 2025.

3. This Notice is being filed with this Court within thirty days of Experian receiving a copy of a summons and Plaintiff's initial pleading setting forth the claims for relief upon which Plaintiff's action is based.

4. This Court is the proper district court for removal because the State Court Action is pending within this district.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon the sole defendant in the State Court Action is attached hereto as **Exhibit A**.

6. Experian is a corporation which, for monetary fees, regularly engages in whole or in part in the practice of assembling consumer credit information or other information on consumers for the purpose of furnishing consumer reports to third parties. Experian uses means or facilities of interstate commerce for the purpose of preparing or furnishing consumer reports, and therefore is a "consumer reporting agency" within the meaning of 15 U.S.C. § 1681a(f).

7. The claims for relief alleged in the State Court Action arise under the Fair Credit Reporting Act, 15 U.S.C. §§ 1681 *et seq.* Thus, this Court has original subject matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. The above-

captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

8. Promptly after the filing of this Notice of Removal, Experian shall provide notice of the removal to Plaintiff through his attorney of record in the State Court Action, and shall file a copy of this Notice with the clerk of the Court in the State Court Action, as required by 28 U.S.C. § 1446(d).

Dated: March 17, 2025

Respectfully submitted,

/s/ Karl Colbary

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